

UNITED STATES OF AMERICA

V.

No. 4:25-CR- 106

Judge

TRAMMELL OMAR JONES

SOT AGO

INDICTMENT

The United States Grand Jury Charges:

COUNT ONE

<u>Violation</u>: 18 U.S.C. § 933(a)(2), (3) (Trafficking in Firearms; Conspiracy and Attempt)

From in or about March 2020, and continuing up to and including the date of the filing of this indictment, in the Eastern District of Texas and elsewhere, TRAMMELL OMAR JONES, Defendant, did knowingly conspire and agree with others known and unknown to the United States Grand Jury to receive or attempt to receive, in and affecting interstate commerce, firearms, including but not limited to the following, to-wit: Beretta, model: 92FS, 9 mm pistols; Romar/ Cugir, model: Micro Draco, 7.62 pistols; Glock, model: 23 and 22, .40 caliber pistols; and Glock, model: 23 Gen 5, .40 caliber pistols, while knowing or having reasonable cause to believe that such receipt would constitute a felony (as defined in section 932(a)), in violation of Title 18, United States Code, Sections 933(a)(2), (3).

COUNT TWO

Violation: 18 U.S.C. § 932(b)(2) (Straw Purchasing of Firearms)

From in or about March 2020, and continuing up to and including the date of the filing of this indictment, in the Eastern District of Texas and elsewhere, TRAMMELL OMAR JONES, defendant, did knowingly purchase, and conspire with others known and unknown to the United States Grand Jury to purchase firearms, including, but not limited to: Beretta, model: 92FS, 9 mm pistols; Romar/Cugir, model: Micro Draco, 7.62 pistols; Glock, model: 23 and 22, .40 caliber pistols; and Glock, model: 23 Gen 5, .40 caliber pistols, in or otherwise affecting interstate or foreign commerce, for, on behalf of, or at the request or demand of another person, knowing or having reasonable cause to believe that the individual recipient intended to use, carry, possess or sell or otherwise dispose of the firearm in furtherance of a felony or a drug trafficking crime, in violation of Title 18, United States Code, Section 932(b)(2).

COUNT THREE

Violation: 18 U.S.C. § 922(a)(1)(A) (Engaging in the Business Without a License (Firearms))

From in or about March 2020, and continuing up to and including the date of the filing of this Indictment, in the Eastern District of Texas and elsewhere, the defendant, TRAMMELL OMAR JONES, not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in firearms, in violation of 18 U.S.C. §§ 922(a)(1)(A), 923(a), and 924(a)(1)(D).

NOTICE OF INTENTION TO SEEK CRIMINAL FORFEITURE

Pursuant to 18 U.S.C. § 981(a)(1)(C), 18 U.S.C. § 924(d), 18 U.S.C. § 934, and 28

<u>U.S.C. § 2461.</u>

As the result of committing the offenses alleged in this Indictment, the defendants shall forfeit to the United States:

- a. any firearms and ammunition involved or used in the commission of these offenses;
- b. any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such violation; and
- c. any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation, including, but not limited to:
 - i. Glock, model: 22, 40 caliber pistol, bearing S/N: BBSZ345
 - ii. Glock, model: 22, 40 caliber pistol, bearing S/N: KSP348
 - iii. Glock, model: 23, 40 caliber pistol, bearing S/N: CCFE798
 - iv. Glock, model: 43x, 9mm pistol, bearing S/N: BTTF446
 - v. Glock, model: 30, 45 caliber pistol, bearing S/N: CCTP189
 - vi. Pioneer Arms Corp, model: Hellpup, 7.62 caliber pistol, bearing S/N: PAC24PL28013
 - vii. Glock barrel bearing S/N: BYZE416
 - viii. Glock barrel bearing S/N: BYNU909
 - ix. Glock barrel bearing S/N: CCTP189
 - x. Any ammunition related to the case.

A TRUE BILL

Date: 5-14-25

GRAND JURY FOREPERSON

ABE MCGLOTHIN
ACTING UNITED STATES ATTORNEY

MATTHEW T. JOHNSON

Assistant United States Attorney

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS SHERMAN DIVISION

UNITED STATES OF AMERICA	§	
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V.	§	No. 4:25-CR- 106
	§	Judge
TRAMMELL OMAR JONES	§	500

NOTICE OF PENALTY

Count One

Violation:

18 U.S.C. § 933(a)(2), (3), 933(b)

Penalty:

Imprisonment of not more than fifteen years, a fine not to exceed \$250,000, or both; a term of supervised release of not

more than three years.

Special Assessment: \$ 100.00

Count Two

Violation:

18 U.S.C. § 932(b)(2)

Penalty:

Imprisonment of not more than fifteen years, a fine not to exceed \$250,000, or both; a term of supervised release of not more than three years.

If a violation of subsection (b) is committed knowing or with reasonable cause to believe that any firearm involved will be used to commit a [Federal or State] felony, a Federal crime of terrorism, or a drug trafficking crime, the person shall be sentenced to a term of imprisonment of not more than 25 years.

Special Assessment: \$ 100.00

Count Three

Violation:

18 U.S.C. § 922(a)(1)(A)

Penalty:

Imprisonment of not more than five years, a fine not to

exceed \$250,000, or both; a term of supervised release of not

more than three years.

Special Assessment: \$ 100.00